

**STARK & STARK**

A Professional Corporation

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*Attorneys for Defendants, Bail Integrity Solutions, Inc. and Thomas Brian Shirah*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MICROBILT CORPORATION,

Plaintiff,

v.

BAIL INTEGRITY SOLUTIONS, INC. and  
THOMAS BRIAN SHIRAH in his individual  
capacity; ABC COMPANIES (1-10), JOHN  
and JANE DOES (1-10),

Defendants.

CIVIL ACTION NO.  
3:19-CV-00637 (MAS)(LHG)

**NOTICE OF MOTION TO BE  
RELIEVED AS COUNSEL**

**Returnable: October 4, 2021**

TO: All Counsel of Record

**PLEASE TAKE NOTICE** that on October 4, 2021 at 9:00 AM, or as soon thereafter as  
counsel may be heard, Stark & Stark, P.C. and Craig S. Hilliard and Gene Markin, attorneys for  
Defendants, Bail Integrity Solutions, Inc. and Thomas Brian Shirah (collectively “Bail  
Integrity”), shall move before the Honorable Lois H. Goodman, United States Magistrate Judge  
for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East  
State Street, Trenton, New Jersey 08608, pursuant to Local Civil Rule 102.1, for leave to  
withdraw as counsel.

In support of this motion, counsel shall rely on the accompanying Declaration of Craig S.  
Hilliard.

A proposed form of Order is provided with this motion.

Respectfully submitted,

**STARK & STARK**  
A Professional Corporation  
*Attorneys for Defendants*

By: s/ *Craig S. Hilliard*  
CRAIG S. HILLIARD, ESQ.

Dated: September 9, 2021